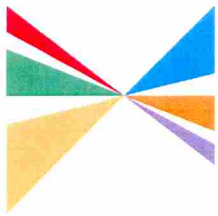


SOUTHERN CALIFORNIA



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August 17, 2009

Christopher Calfee, Special Counsel
ATTN: CEQA Guidelines
California Resources Agency
1017 L Street, #2223
Sacramento, CA 95814
Facsimile: (916) 653-8102
CEQA.Rulemaking@resources.ca.gov

Re: Proposed Amendments to the CEQA Guidelines

Dear Mr. Calfee:

The Southern California Association of Governments (SCAG) appreciates the opportunity to comment on the **Proposed Amendments to the CEQA Guidelines ("Proposed Amendments")**, for the mitigation of greenhouse gas emissions and the effects of greenhouse gas emissions.

SCAG understands the importance of addressing the effects of greenhouse gas (GHG) emissions. In providing comments regarding the Proposed Amendments and developing our own planning approaches, SCAG maintains three basic principles:

1. SCAG is responsible for the Regional Transportation Plan (RTP). The RTP is a long-range blueprint for the region's transportation system. In order to bring in federal funds that finance infrastructure projects within the region, the RTP must be adopted on time. SCAG's 2008 RTP Program Environmental Impact Report (PEIR) included an estimate of GHG emissions for the year 2035 from all sources, by county for SCAG's six-county region. We anticipate refining that estimate in the 2012 RTP PEIR but the extent of the refinements will depend heavily on the availability of appropriate data and modeling techniques. Therefore, we would encourage that CEQA requirements for the analysis of GHG emissions be reasonable and attainable within the timeframe needed to complete the RTP process and based on evolving practice.

2. We support our member jurisdictions acting as lead agencies for local project development. Therefore, we are supportive of CEQA guidelines that are flexible and provide clarity regarding project analysis requirements and the establishment of reasonable and achievable mitigation requirements and thresholds of significance. In addition, efforts to curb emissions and set thresholds being conducted by multiple responsible agencies should be coordinated and/or consolidated to avoid inconsistency, confusion and facilitate compliance. SCAG encourages the development of guidelines and regulations that will maximize coordination and minimize the opportunity for unwarranted legal challenges and delays.
3. A programmatic approach to the analysis, mitigation and regulation of GHG emissions, either at the statewide, regional or local level should be encouraged. Predictability is important to the region. GHG impacts are distinctive in that significant project-specific impacts at the local level may, in the long run, be more beneficial when analyzed from a wider perspective, such as from the local jurisdiction or regional level. Regional plans and analysis are the most practical in that anything smaller lacks proper context to understand GHG emission effects. Therefore, SCAG is supportive of a programmatic approach to GHG analysis, mitigation and regulation. SCAG is in the process of developing a Sustainable Communities Strategy (SCS) for the region in accordance with Government Code §65080 et seq. that will be part of SCAG's 2012 RTP which may provide a framework to advance programmatic review.

Overall, SCAG supports the Proposed Amendments to the CEQA guidelines and finds them to be in line with the principles noted above. The Proposed Amendments are consistent with the broad tone of existing guidelines and continue to allow considerable flexibility to Lead Agencies. SCAG is also supportive of the programmatic approach to the analysis and mitigation of GHG emissions that are outlined in the Proposed Amendments.

At the same time, SCAG recognizes the amendments, as written, may allow so much flexibility that determining compliance may be difficult. Therefore, SCAG promotes the development of reasonable and achievable thresholds that would be consistent statewide (if not nationally). GHG emissions are globally significant, and therefore GHGs should be reviewed against a consistent, uniform baseline across as many jurisdictions as possible. To that end, SCAG would like to encourage the Resources Agency to work with California Air Resources Board (ARB) as well as, local Air Quality Management Districts to identify appropriate thresholds of significance for GHG emissions in the State, and, to the extent possible focus these thresholds on determining compliance through both project-specific and plan-based approaches.

If you have any questions regarding the contents of this comment letter please contact me at (213) 236-1800 or Huasha Liu, Director of Planning Methods, Assessment and Compliance at (213) 236-1838, or liu@scag.ca.gov.

Sincerely,



Hasan Ikhrata
Executive Director
HI:cf/jl